

Jeffrey M. Pollock, Esq.
Michael W. Sabo, Esq.
FOX ROTHSCHILD LLP
Formed in the Commonwealth of Pennsylvania
Princeton Pike Corporate Center
997 Lenox Drive
Lawrenceville, NJ 08648
Telephone: 609-896-7660
Facsimile: 609-896-1469
Attorneys for Andy Birchfield and Beasley Allen

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM
POWDER PRODUCTS MARKETING,
SALES PRACTICES AND PRODUCTS
LIABILITY LITIGATION

Case No. 3:16-md-2738 (MAS)/(RLS)

MLD Case No. 2738

[FILED ELECTRONICALLY]

Return Date: January 2, 2024

DECLARATION OF JOHN J. GASPAROVIC

I, JOHN J. GASPAROVIC, declare:

1. I make this declaration based on personal knowledge and in opposition to Defendants Johnson & Johnson and LTL Management, LLC (collectively, J&J)'s Order to Show Cause Seeking to Disqualify Andy Birchfield and Beasley Allen Crow Methvin Portis & Miles, P.C. (Beasley Allen) from this litigation and remove Beasley Allen from the Plaintiffs' Steering Committee.

2. I am Co-founder and the Executive Chairman of Legacy Liability Solutions LLC (Legacy).

3. I have held multiple Chief Legal Officer positions of companies (including public companies) with mass tort exposure. Over my 41 year career, I have served as the Chief Legal Officer of Exide Technologies, BorgWarner Inc., Federal-Mogul Corporation, Roadway Corporation and Guardian Automotive. While I was serving as Chief Legal Officer, I worked with James Conlan to structurally optimize both BorgWarner and Exide Technologies.

4. I am well aware of the Rules of Professional Conduct governing lawyer conduct, including R.P.C. 1.6, Confidentiality of Information.

5. I am well aware of the ethical obligations of an attorney, including the duty to maintain client confidences after a representation has concluded and after an attorney moves to other employment.


6. At no time has James Conlan disclosed any of J&J's confidential or privileged information to me or Legacy..

7. Legacy has never possessed and therefore never could disclose to Mr. Birchfield or any member of his firm, Beasley Allen, any confidential information belonging to J&J.

8. Moreover, neither Legacy nor Conlan has any J&J privileged or confidential information that is required for Legacy to consensually transact with J&J to solve J&J's current and future talc liability (with finality); the Legacy model applies similarly to all solvent mass tort defendants.

Under 28 U.S.C. 1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed on December 17, 2023


JOHN J. GASPAROVIC
Executive Chairman
Legacy Liability Solutions LLC